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April 4, 2019

**VIA ECF**

The Honorable Valerie E. Caproni  
U.S. District Court, Southern District Of New York  
Thurgood Marshall Courthouse  
40 Foley Square, Room 240  
New York, NY 10007

Re: Samit and Lantz v. CBS Corporation, et al., No. 1:18-cv-07796-VEC

Dear Judge Caproni:

This Firm represents Defendants CBS Corporation (“CBS”), Gary L. Countryman, Linda M. Griego, Joseph R. Ianniello, Lawrence Liding, Doug Morris, and David Rhodes in the above-captioned action. Pursuant to Section 4.B. of Your Honor’s Individual Practices in Civil Cases, we write on behalf and with the consent of certain Defendants (the “Moving Defendants”)<sup>1</sup> to request the Court’s permission to file an omnibus brief of 75 pages or fewer in support of their consolidated motion to dismiss Plaintiff’s Amended Complaint for Violations of the Federal Securities Laws (the “Amended Complaint”) (ECF No. 59). As per Paragraph 2 of the Court’s Order Regarding Time To File And Respond To The Amended Consolidated Complaint (the “Order”), dated January 25, 2019 (ECF No. 53), the motion to dismiss must be filed no later than April 12, 2019.

The Moving Defendants intend to file a single, consolidated motion to dismiss the Amended Complaint, supported by a single memorandum of law. Given the number of Moving Defendants and the length and complexity of the Amended Complaint, which contains over 200 paragraphs and spans some 81 pages, the Moving Defendants respectfully submit that an enlargement of the page limit for their opening memorandum of law from 25 pages to 75 pages is warranted. This approach will reduce the number of motions presented to the Court and the cumulative length of Defendants’ opening submissions, thereby promoting efficiency and lessening the burden on the Court.

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<sup>1</sup> The Moving Defendants comprise 16 of the 17 named Defendants—namely, CBS, Joseph R. Ianniello, Lawrence Liding, David Rhodes, David R. Andelman, Joseph A. Califano, Jr., William S. Cohen, Gary L. Countryman, Charles K. Gifford, Leonard Goldberg, Bruce S. Gordon, Linda M. Griego, Robert N. Klieger, Martha L. Minow, Doug Morris, and Shari Redstone. The Moving Defendants do not include Defendant Leslie Moonves, who we understand intends to file a separate motion to dismiss.

Consistent with Paragraph 3(c) of the Court's Order, we have met-and-conferred with counsel for Lead Plaintiff Construction Laborers Pension Trust for Southern California ("Lead Plaintiff") and with counsel for Defendant Leslie Moonves, who consent to this request. Lead Plaintiff's consent was expressly conditioned upon Lead Plaintiff being afforded the same 75 pages to respond to the omnibus motion to dismiss, citing the same efficiency reasons delineated by counsel for the Moving Defendants.

Respectfully submitted,

*M. Eaton*

Mary Eaton

cc: All Counsel of Record (via ECF)